



"Stepp, Tim"  
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09/10/2004 02:42 PM

To: Jim Christiansen/EPR/R8/USEPA/US@EPA  
cc: "Courtney.Zamora@volpe.dot.gov"  
<Courtney.Zamora@volpe.dot.gov>, "SupernaughRS@cdm.com"  
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<borowiecpj@cdm.com>, "stohrdahldm@cdm.com"  
<stohrdahldm@cdm.com>, "Podolinsky, John"  
<jpodolinsky@state.mt.us>, "Thompson, Ricknold"  
<rithompson@state.mt.us>  
Subject: Approval for BNSF usage of Lincoln County asbestos cell

Dear Jim,

I appreciate your response. We also received the disposal request from EMR's on behalf of BNSF. I will attach this email to that request for the file.

As I discussed with CDM's Darrel Stohrdahl, the BNSF material is not regulated if the friable ACM content is below 1% by area (PLM analysis method). In that case, usage of the railroad ballast for building a wet weather access ramp is appropriate without the need for daily cover. Otherwise, the material must be handled as friable ACM during disposal.

The BNSF CERCLA disposal action is approved for the Libby Class IV unit. An approval letter will follow in the mail.

Thanks.

Tim Stepp  
406.444.4725  
Solid Waste Program  
Montana DEQ

-----Original Message-----

From: Christiansen.Jim@epamail.epa.gov  
[mailto:Christiansen.Jim@epamail.epa.gov]  
Sent: Wednesday, September 01, 2004 4:48 PM  
To: Stepp, Tim  
Cc: zamora@volpe.dot.gov  
Subject: BNSF usage of Lincoln County asbestos cell

Burlington Northern Santa Fe Railroad (BNSF) is conducting a CERCLA response action at the BSNF railyard, Operable Unit 6 of the Libby Asbestos Site in Libby, MT. The actions are taken in compliance with an Administrative Order on Consent (AOC) with EPA, using CERCLA response authority. Part of BNSF's EPA-approved response action involves disposal of asbestos contaminated waste at the EPA-constructed asbestos cell Lincoln County landfill. This action was coordinated with EPA and Lincoln County. Because this is a response action taken under CERCLA response authority, third-party usage of the cell by BNSF is appropriate for the subject material. The work is scheduled to begin approximately September 7, 2004 and be complete later this year. This email only applies to wastes generated as part of this cleanup action.

Jim Christiansen  
Remedial Project Manager